

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: : Chapter 11
:
RTI Holding Company, LLC, *et al.*,¹ : Bankruptcy No. 20-12456 – JTD
:
Debtors. :

**NOTICE OF JOINDER BY COMMONWEALTH OF PENNSYLVANIA IN THE STATE
OF TEXAS' OBJECTION TO DEBTORS' MOTION FOR ENTRY OF AN ORDER
AUTHORIZING THE DEBTORS TO HONOR CERTAIN PREPETITION
OBLIGATIONS TO CUSTOMERS AND TO OTHERWISE CONTINUE CERTAIN
CUSTOMER PROGRAMS IN THE ORDINARY COURSE OF BUSINESS**

The Commonwealth of Pennsylvania by and through the Pennsylvania Office of Attorney
General, Josh Shapiro, its counsel, ("Commonwealth"), *JOINS* in the State of Texas' *Objection
to Debtors' Motion for Entry of an Order Authorizing the Debtors to Honor Certain Prepetition*

¹ The Debtors in these Chapter 11 cases and the last four (4) digits of each Debtor's U.S. Tax Identification Number are as follows: RTI Holding Company, LLC (4966); Ruby Tuesday, Inc. (5239); Ruby Tuesday, LLC (1391); RTBD, LLC (6505); RT of Carroll County, LLC (8836); RT Denver Franchise, L.P. (2621); RT Detroit Franchise, LLC (8738); RT Distributing, LLC (6096); RT Finance, LLC (7242); RT FL Gift Cards, Inc. (2189); RT Florida Equity, LLC (7159); RT Franchise Acquisition, LLC (1438); RT of Fruitland, Inc. (1103); RT Indianapolis Franchise, LLC (6016); RT Jonesboro Club (2726); RT KCMO Franchise, LLC (7020); RT Kentucky Restaurant Holdings, LLC (7435); RT Las Vegas Franchise, LLC (4969); RT Long Island Franchise, LLC (4072); RT of Maryland, LLC (7395); RT Michiana Franchise, LLC (8739); RT Michigan Franchise, LLC (8760); RT Minneapolis Franchise, LLC (2746); RT Minneapolis Holdings, LLC (7189); RT New England Franchise, LLC (4970); RT New Hampshire Restaurant Holdings, LLC (7438); RT New York Franchise, LLC (1154); RT Omaha Franchise, LLC (7442); RT Omaha Holdings, LLC (8647); RT One Percent Holdings, LLC (6689); RT One Percent Holdings II, LLC (2817); RT Orlando Franchise, LP (5105); RT Restaurant Services, LLC (7283); RT South Florida Franchise, LP (3535); RT Southwest Franchise, LLC (9715); RT St. Louis Franchise, LLC (6010); RT Tampa Franchise, LP (5290); RT Western Missouri Franchise, LLC (6082); RT West Palm Beach Franchise, LP (0359); RTTA, LP (0035); RTT Texas, Inc. (2461); RTTT, LLC (9194); Ruby Tuesday of Allegany County, Inc. (8011); Ruby Tuesday of Bryant, Inc. (6703); Ruby Tuesday of Columbia, Inc. (4091); Ruby Tuesday of Frederick, Inc. (4249); Ruby Tuesday of Linthicum, Inc. (8716); Ruby Tuesday of Marley Station, Inc. (1641); Ruby Tuesday of Pocomoke City, Inc. (0472); Ruby Tuesday of Russellville, Inc. (1601); and Ruby Tuesday of Salisbury, Inc. (5432). The Debtors' mailing address is 333 East Broadway Ave., Maryville, TN 37804.

Obligations to Customers and to Continue Certain Customer Programs in the Ordinary Course of Business, as follows:

1. The Commonwealth is a party in interest through its role as *parens patriae* and under its authority to enforce the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, *et seq.* (“Consumer Protection Law”).
2. Debtors operate at least two (2) restaurants within the Commonwealth of Pennsylvania.
3. Debtors’ failure to honor pre-petition Gift Card obligations by discontinuing or altering Gift Cards would violate provisions of the Consumer Protection Law.

WHEREFORE, based on the foregoing, the Commonwealth of Pennsylvania respectfully requests that the Court sustain the objection filed by Texas as proposed.

Respectfully submitted,

JOSH SHAPIRO
ATTORNEY GENERAL

DATED: October 7, 2020

BY: /s/ Carol E. Momjian

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**Pro Hac Vice currently pending*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via the Court's Electronic Filing System on all parties requesting notice in this proceeding on October 7, 2020.

/s/ Carol E. Momjian
CAROL E. MOMJIAN
Senior Deputy Attorney General